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10 ATTORNEYS FOR STATECO INC. AND
11 THOMAS NATOLI

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 M. DIANE KOKEN, Insurance Commissioner of the
16 Commonwealth of Pennsylvania, acting in her official
17 capacity as Statutory Liquidator of Legion Insurance
18 Company and Villanova Insurance Company,

19 Plaintiff,

20 vs.

21 STATECO INC. dba STATECO INSURANCE
22 SERVICES and THOMAS NATOLI, and XYZ
23 CORPS. 1-10, and DOES 1 through 10, Inclusive,

24 Defendants.

No. C 05 3007 - JF

25
26 **STIPULATION AND [PROPOSED]
27 ORDER EXTENDING
DEFENDANTS STATECO AND
THOMAS NATOLI'S TIME TO
FILE AN AMENDED COUNTER
CLAIM**

28 AND RELATED CROSS-ACTION.

29
30 Defendants and Counter-Claimants Stateco Inc., doing business as Stateco Insurance
31 Services, and Thomas Natoli (collectively the "Stateco Defendants") and Plaintiff and Counter-
32 Defendant M. Diane Koken, ("Koken") by and through their undersigned counsel, hereby stipulate
33 as follows:

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35 1. WHEREAS Stateco filed its Amended Answer and Counterclaim ("Counterclaim")
36 on or about December 19, 2005; and

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38 2. WHEREAS on or about January 5, 2006, Koken filed a motion to dismiss Stateco's

1 Counterclaim (“Motion to Dismiss”); and

2 3. WHEREAS, after a hearing on the Motion to Dismiss, the Court entered it Order
3 Granting Motion to Dismiss With Leave To Amend on or about April 4, 2006 (the “Order”); and

4 4. WHEREAS, the Order required that any amended counterclaim should be filed
5 within twenty days of the Order; and

6 5. WHEREAS the Stateco Defendants have requested an extension of time to file their
7 amended counterclaim; and

8 6. WHEREAS the extension requested by the Stateco Defendants will not affect any
9 court-ordered scheduling deadlines;

10 IT IS PROPOSED AND STIPULATED:

11 The date set for the Stateco Defendants to respond to amend their counter-claims will be
12 extended from April 24, 2006 to May 1, 2006.

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1 IT IS SO STIPULATED.

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3 DATED: April 24, 2006

BERLINER COHEN

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6 By



Laura A. Palazzolo
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8 Attorneys for Defendants and Cross-
9 Complainants STATECO INC., dba STATECO
10 INSURANCE SERVICES and THOMAS
NATOLI

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13 DATED: April 24, 2006

14 WOLF, BLOCK, SCHORR and SOLIS-
15 COHEN LLP

16 By



Michael Cavadel
17 Attorneys for Plaintiff Counter-Defendant M.
18 DIANE KOKEN

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21 IT IS SO ORDERED

22 DATED: May 1, 2006

23 By



Jeremy Fogel
United States District Court Judge
24 United States District Court Judge